



Via E-Mail

October 22, 2018

Ms. Sara Ayres
US EPA
Monitoring Assistance and Media Programs Assistance
Office of Compliance
Washington, DC 20460

Re: Request for One Year Brick MACT (Subpart JJJJ) Compliance Extension
Brick Kiln No. 2 (ID No. S005)
Denver Brick Plant #60
General Shale Brick Inc.
Denver, Colorado

Dear Ms. Ayres:

General Shale Brick Inc. (General Shale) submitted a request for a one year compliance extension for the Brick MACT on August 23, 2018. Additional information was submitted to your attention via email on October 10, 2018. The information in this letter updates the previous information that has been submitted to the US EPA, and we are also providing in this letter additional supplemental information to your agency.

General Shale owns the Denver Brick Plant #60 located in Denver, CO. The facility currently operates the referenced brick kiln at the site. The referenced brick kiln has been determined to be a major hazardous air pollutant (HAP) emissions source.

The current kiln has no control devices. General Shale has determined that it will install a dry injection fabric filter (DIFF) on the referenced brick kiln to control HAP emissions below the major source threshold. The kiln is a large kiln as defined by the Brick MACT. It is General Shale's desire to demonstrate compliance by adding the DIFF and re-designating the kiln and site as a minor HAP source.

General Shale has contracted with Hellmich to install a DIFF. In a DIFF, sorbent is injected into the gas stream prior to the filters. The sorbent absorbs the HF and the sorbent is then collected on the filters.

The current pre-controlled HF emissions varies based on the content of the raw material but we have seen a maximum HF emission rate based on kiln design of around 10.8 lb/hr. The HCL is in the 2.3 lb/hr range. The DIFF will remove 90% of the HAPs, which will result in re-classifying the source as a minor HAP source with HAP emissions less than 10/25 tons per year.

General Shale has been working with the CO air Pollution Control Division to permit the DIFF. It appears that General Shale may have the permit prior to the Brick MACT compliance date. Due to the regulatory requirements, work was allowed to commence on constructing the DIFF.

The Subpart JJJJ compliance date for the “existing source MACT” is December 26, 2018. General Shale has reviewed its schedule and has determined as stated previously that there may not be ample time to complete construction, conduct operational shakedown, and have the DIFF fully operational by this date.

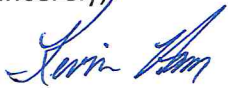
For the reasons presented above in this letter, General Shale is requesting a one year extension from December 26, 2018 to December 26, 2019 in order to demonstrate that Brick Kiln No. 2 (ID No. S005) will be a minor source of HAP. This request is being filed in accordance with the EPA memorandum dated June 14, 2018 and 40 CFR Part 63.6(i)(3)-(7). The requirements of the referenced regulations are outlined below:

1. §63.6(i)(3) – This section outlines the general requirements to submit a request for extension of compliance.
2. §63.6(i)(4)(i)(A) – General Shale is requesting a one year compliance extension for Brick Kiln No. 2 (ID No. S005). In making this request, General Shale requests that the one year compliance extension apply to demonstrate that the referenced facility is a minor source of HAPs.
3. §63.6(i)(4)(i)(B) – General Shale filed the original request for compliance extension on or before August 28, 2018. As such, the request for compliance extension has been filed at least 120 days before the Subpart JJJJ compliance date of December 26, 2018. This letter provides supplemental information to the US EPA.
4. §63.6(i)(4)(i)(C) – This section of the regulations is not applicable to our request.
5. §63.6(i)(4)(ii) – This section of the regulations is not applicable to our request.
6. §63.6(i)(5) – This section of the regulations is not applicable to our request.
7. §63.6(i)(6)(i)(A) – As stated previously in this letter, General Shale will install a DIFF to comply with Subpart JJJJ.
8. §63.6(i)(6)(i)(B) – Our compliance schedule is as follows:
 - a. On site construction initiated March 26, 2018.
 - b. On site installation of the DIFF completed June 25, 2018.
 - c. Operation of the DIFF will commence by December 1, 2018.
 - d. Final compliance with minor source emission limits and permit requirements will be demonstrated within 180 days after December 26, 2019 or within 180 days of initial operation, whichever occurs first.

9. §63. 6(i)(6)(i)(B)(ii) - This section of the regulations is not applicable to our request.
10. §63. 6(i)(7) – General Shale is filing this plan in accordance with the EPA memorandum dated June 14, 2018 (see attachment).

On behalf of General Shale, I want to thank you and your staff in advance for your consideration of our one year compliance extension request for Brick Kiln No. 2 (ID No. S005). If you have any questions regarding this request, please feel free to contact Mr. Warren Paschal of General Shale at (919) 774-6533, Ext. 221.

Sincerely,

A handwritten signature in blue ink, appearing to read "Kevin Ham", with a stylized flourish at the end.

Kevin Ham
Vice President

cc: Mr. Warren Paschal, General Shale
Mr. Dale Overcash, Trinity Consultants